## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

KIZZY LANDRY and INDIA LANDRY,	)(	Civil Action No.: 4:17-cv-3004
	)(	(Jury)
Plaintiffs,	)(	
	)(	
v.	)(	
	)(	
CYPRESS FAIRBANKS ISD, et al.,	)(	
	)(	
Defendants.	)(	

## PLAINTIFFS' EXPERT DESIGNATION

To: Defendant Cypress Fairbanks ISD, and Mark Henry, by and through their attorney of record, Christopher B. Gilbert, Thompson & Horton LLP, 3200 Southwest Freeway, Suite 2000, Houston, Texas 77027

To: Defendant Strother, by and through their attorney of record, Clay T. Grover, Rogers, Morris & Grover, L.L.P., 5718 Westheimer, Suite 1200, Houston, Texas 77057

NOW COME PLAINTIFFS and file these expert disclosures:

Randall L. Kallinen, atty. 511 Broadway Street Houston, Texas 77012 Telephone: 713,320.3785

Mr. Kallinen is a fact and expert witness on reasonable attorney's fees and expenses. Mr. Kallinen is of the opinion a reasonable hourly rate for his services is \$550 per hour based upon his 24 years of civil rights litigation including trial court, appellate court and U.S. Supreme Court experience. Attorney's fees will be determined by affidavit and motion after a prevailing party is determined at which time attorney hours and other supporting material will be produced.

Respectfully Submitted,

/s/ Randall L. Kallinen
Randall L. Kallinen
Kallinen Law PLLC
Attorney-In-Charge
State Bar of Texas No. 00790995
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Admitted, U.S. Supreme Court, 5th U.S. Circuit Court of Appeals,
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Attorney for Plaintiff

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing has been transmitted to the all counsel appearing in this cause and pro se parties on this the 10<sup>th</sup> day of December 2018, by filing with the ECF System of the United States District Court for the Southern District of Texas.

/s/ Randall L. Kallinen Randall L. Kallinen